

MM 95-176
Reply comments on: Captioning and Video Description of Video Programming

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Office of the Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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Enclosed is literature on our product to encode closed captions into live and existing video. The Closed Caption Encoder product, ccE™, is a combination of a software package along with an external box which plugs into a PC's serial port.

Two features make ccE unique:

First, ccE pricing is unprecedentedly aggressive. (currently priced at \$2990)
And second, the product is extremely easy to use.

Our product addresses the economic and undue burden issues of some providers.

Because of the imperfections in real-time captioning we feel the FCC will have to balance the issues of quality, economics, and burden to establish what is reasonable for each demographic group of potential caption providers.

Generally, the economic issues pertaining to real-time captions have to do with the cost of the initial equipment and the ongoing costs of trained stenographers.

The economic issues for non-real-time captions focus on initial equipment, training, and ongoing costs. ccE's focus on ease of use has economic impacts on training, ongoing costs, and time to produce. ccE pricing is targeted to minimize the initial equipment costs.

Data specifying initial and ongoing captioning costs are detailed in the Telecom Act of '96. ccE addresses economic and undue burden issues by differentiating itself from typical solutions. Our product differentiates itself by using standard Windows user interfaces and standard hardware. This minimizes the need for specialized hardware/software training. ccE is unique with its WYSIWYG (what you see is what you get) interface. Complex technical issues like time-coding are kept hidden from the user. With our ccE package a user can add captions after just one mouse click.

With ccE, many of the typical captioning costs become negligible or non-existent. For whole classes of caption providers, ccE is their most cost-effective solution.

The US Department of Education have detailed how closed captioning can impact education (reading, ESL, LD), deaf and hearing impaired, and mainstream populations as well. An intentional side effect of making the ccE product easy to use, was to allow for diversity of users. Allowing for users ranging from broadcasters to educators/students to people with disabilities follows the spirit of the Telecom and ADA acts as well.

We have designed our product to address some of the legitimate issues pertaining to economics and undue burden. Please take these factors into account when balancing the scales to determine what is a reasonable burden on some to provide a reasonable benefit to others.

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Closed Caption Encoder™



adds Closed Captions to your live or existing videos.

The Closed Caption Encoder (ccE™) offers everything you need to produce Closed Captions — and more.

The Closed Caption Encoder product is a combination of a Windows based program along with an external box which plugs into your PC's serial port.

Closed Caption Encoder is easy to use.

You are just one mouse click away from captioning! No coursework, seminars, or training programs to struggle through. No new environment, workstation, or hardware to decipher. Even time-coding issues are completely transparent to the user.

Closed Caption Encoder is packed with features that don't get in your way.

Whether your task is commercial post-production, meeting the ADA requirements, English as a Second Language (ESL) related, or for home use, the ccE product will do the job.

Close Caption Encoder saves you time and money. The ease of use of the software makes your captioning task very efficient. Doing it yourself is faster and easier than specifying your requirements to a post-production facility, not to mention the expense of off-site captioning. Our product is extremely cost effective. Priced at less than 1/10 of the typical cost with significant saving in staff time!

Closed Caption Encoder meets your FCC and ADA requirements. Closed captions have benefits beyond simply meeting your legal requirements. However, the ccE is a permanent solution to ADA related lawsuits brought by the Justice Department or even brought by employees.

Closed Caption Encoder adds value to your product. Many organizations are refusing to buy uncaptioned material. Benefits, such as, increased retention and passive learning to non-hearing impaired individuals are only positive factors. Captioning is truly efficient compared to providing a sign language interpreter every time you show a video. Significant benefits are provided to viewers with English as their second language (ESL).

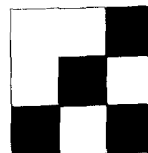
Features:

- ♦ Complete compliance to the ADA. Addresses the Telecom Act of 1996 and supports the latest EIA608 standards.
- ♦ Supports typing captions in live. Typed text is displayed immediately as captions.
- ♦ Support for preexisting text. Create captions from existing text created with ccE or your favorite word processor.
- ♦ Support for Windows 3.1 and Win95.
- ♦ On-line help including context-sensitive help.
- ♦ Support for nine languages: English, Spanish, French, Portuguese, German, Danish, Italian, Finnish, and Swedish.
- ♦ Supports standard video along with S-video formats.
- ♦ No dip switches or jumpers to configure.
- ♦ Complete, no hidden costs, with everything you need: software, cables, manual, and ccE external box. [To add captions to an existing videotape you'll need a VCR to play the tape back from and a VCR to record the results to.]

System Requirements:

PC running Windows 3.1 or Windows 95.
4 MB RAM (8 MB preferred).
One available serial port.
At least 10MB of free hard disk space.
A 3.5" floppy drive to install the software.
Optionally, a closed caption compatible television to review your results.

If you have any additional questions or would like to place an order just call our toll-free number today: **800-992-9000**.



International Computers
12021 W. Bluemound Rd.
Wauwatosa WI 53226
414-764-9000